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*Counsel for Plaintiffs The Mendham Methodist
Church and The Zion Lutheran
Church Long Valley*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THE MENDHAM METHODIST)
CHURCH; and THE ZION)
LUTHERAN CHURCH LONG)
VALLEY,)

Plaintiffs,)

v.)

MORRIS COUNTY, NEW JERSEY;)
MORRIS COUNTY BOARD OF)
COUNTY COMMISSIONERS;)
MORRIS COUNTY HISTORIC)
PRESERVATION TRUST FUND)
REVIEW BOARD; and JOHN)
KRICKUS, in his official capacity as)
Commissioner Director for the Morris)
County Board of County)
Commissioners,)

Defendants.)

Case No. 2:23-cv-02347-EP-JSA

**CONSENT MOTION FOR ADMISSION *PRO HAC VICE* OF NOEL J.
FRANCISCO, MEGAN LACY OWEN, J. BENJAMIN AGUIÑAGA, JEREMY
DYS, RYAN GARDNER, AND ERIC C. RASSBACH**

Pursuant to Rule 101.1 of the Local Rules of Civil Procedure of the United States District Court for the District of New Jersey, the undersigned, a member in good standing of the Bar of this Court, hereby moves that attorneys Noel J. Francisco, Megan Lacy Owen, J. Benjamin Aguiñaga, Jeremy Dys, Ryan Gardner, and Eric C. Rassbach be admitted *pro hac vice* to act as counsel for Plaintiffs The Mendham Methodist Church and The Zion Lutheran Church Long Valley in the above-captioned matter. Counsel for Defendants has consented to this motion. In support of this motion, the undersigned states as follows:

1. Noel J. Francisco is a partner with the law firm Jones Day, 51 Louisiana Ave. NW, Washington, DC 20001; Telephone: (202) 879-3939; Fax: (202) 626-1700; Email: njfrancisco@jonesday.com.

2. Noel J. Francisco is admitted and is a member in good standing of the Bar of the District of Columbia; an associate member in good standing of the Virginia State Bar; and a member in good standing of the Bars of the Supreme Court of the United States; the U.S. Courts of Appeals for the First, Second, Third, Fourth, Sixth, Seventh, Eighth, Ninth, Tenth, and District of Columbia Circuits; and the U.S. District Court for the District of Columbia.

3. Noel J. Francisco has represented that he is not currently the subject of any pending disciplinary proceeding in any jurisdiction and that no such proceeding previously has been imposed upon him in any jurisdiction.

4. A certified statement of Noel J. Francisco is attached hereto as required by Local Rule 101.1.

5. Upon entry of Order granting this Motion, Noel J. Francisco shall pay the \$150 admission fee. Mr. Francisco also shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection.

6. Megan Lacy Owen is a partner with the law firm Jones Day, 51 Louisiana Ave. NW, Washington, DC 20001; Telephone: (202) 879-3939; Fax: (202) 626-1700; Email: mlacyowen@jonesday.com.

7. Megan Lacy Owen is admitted and is a member in good standing of the Bars of the District of Columbia; the U.S. Courts of Appeals for the Seventh and Ninth Circuits; and the U.S. District Courts for the District of Columbia and the Northern District of Texas.

8. Megan Lacy Owen has represented that she is not currently the subject of any pending disciplinary proceeding in any jurisdiction and that no such proceeding previously has been imposed upon her in any jurisdiction.

9. A certified statement of Megan Lacy Owen is attached hereto as required by Local Rule 101.1.

10. Upon entry of Order granting this Motion, Megan Lacy Owen shall pay the \$150 admission fee. Ms. Owen also shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection.

11. J. Benjamin Aguiñaga is an associate with the law firm Jones Day, 2727 N. Harwood St. Suite 500, Dallas, TX 75201; Telephone: (214) 220-3939; Fax: (202) 969-5100; Email: jbaguinaga@jonesday.com.

12. J. Benjamin Aguiñaga is admitted and is a member in good standing of the Bars of Texas and the District of Columbia; the U.S. Courts of Appeals for the Second, Third, Fifth, Sixth, Ninth, Eleventh, and District of Columbia Circuits; and the Supreme Court of the United States.

13. J. Benjamin Aguiñaga has represented that he is not currently the subject of any pending disciplinary proceeding in any jurisdiction and that no such proceeding previously has been imposed upon him in any jurisdiction.

14. A certified statement of J. Benjamin Aguiñaga is attached hereto as required by Local Rule 101.1.

15. Upon entry of Order granting this Motion, J. Benjamin Aguiñaga shall pay the \$150 admission fee. Mr. Aguiñaga also shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection.

16. Jeremy Dys is an attorney with the nonprofit legal organization First Liberty, 2001 W. Plano Pkwy., Suite 1600, Plano, TX 75075; Telephone: (972) 941-4444; Email: jdys@firstliberty.org.

17. Jeremy Dys is admitted and is a member in good standing of the Bars of Texas, West Virginia, and the District of Columbia; the Supreme Court of the United States; the U.S. Courts of Appeals for the First, Second, Fourth, Fifth, Sixth, Ninth, Tenth, and Eleventh Circuits; and the U.S. District Courts for the Southern District of West Virginia, the Eastern District of Michigan, the Northern District of Texas, and the Eastern District of Texas.

18. Jeremy Dys has represented that he is not currently the subject of any pending disciplinary proceeding in any jurisdiction and that no such proceeding previously has been imposed upon him in any jurisdiction.

19. A certified statement of Jeremy Dys is attached hereto as required by Local Rule 101.1.

20. Upon entry of Order granting this Motion, Jeremy Dys shall pay the \$150 admission fee. Mr. Dys also shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection.

21. Ryan Gardner is an attorney with the nonprofit legal organization First Liberty, 2001 W. Plano Pkwy., Suite 1600, Plano, TX 75075; Telephone: (972) 941-4444; Email: rgardner@firstliberty.org.

22. Ryan Gardner is admitted and is a member in good standing of the Bars of Texas; the U.S. Courts of Appeals for the First, Second, Third, Fifth, Ninth, and Federal Circuits; and the U.S. District Courts for the Western, Northern, and Eastern Districts of Texas.

23. Ryan Gardner has represented that he is not currently the subject of any pending disciplinary proceeding in any jurisdiction and that no such proceeding previously has been imposed upon him in any jurisdiction.

24. A certified statement of Ryan Gardner is attached hereto as required by Local Rule 101.1.

25. Upon entry of Order granting this Motion, Ryan Gardner shall pay the \$150 admission fee. Mr. Gardner also shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection.

26. Eric C. Rassbach is an attorney and visiting professor in The Hugh and Hazel Darling Foundation Religious Liberty Clinic at the Pepperdine Caruso School of Law, 24225 Pacific Coast Highway, Malibu, CA 90263; Telephone: (310) 506-4611; Email: eric.rassbach@pepperdine.edu.

27. Eric C. Rassbach is admitted and is a member in good standing of the Bars of Texas, California, and the District of Columbia; the Supreme Court of the United States; the U.S. Courts of Appeals for the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits; and the U.S. District Courts for the District of Columbia, the Northern District of California, the Central District of California, the Eastern District of California, the District of Colorado, the Northern District of Florida, the Northern District of New York, the Western District of Wisconsin, Western District of Michigan, the Eastern District of Michigan, the Northern District of Texas, the Eastern District of Texas, the Western District of Texas, and the Southern District of Texas. He is also admitted as a Solicitor in Ireland, but does not practice in Ireland.

28. Eric C. Rassbach has represented that he is not currently the subject of any pending disciplinary proceeding in any jurisdiction and that no such proceeding previously has been imposed upon him in any jurisdiction.

29. A certified statement of Eric C. Rassbach is attached hereto as required by Local Rule 101.1.

30. Upon entry of Order granting this Motion, Eric C. Rassbach shall pay the \$150 admission fee. Mr. Rassbach also shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection.

Dated: July 25, 2023

Respectfully submitted,

s/ Mark Roselli

Mark Roselli

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LAZZARO, P.C.

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*Counsel for Plaintiffs The Mendham
Methodist Church and Zion Lutheran
Church Long Valley*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on July 25, 2023. Notice of this filing will be sent to counsel of record for the parties by operation of the Court's electronic filing system.

s/ Mark Roselli